

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

IN RE:) CASE NO.: 19-51814-LRC
)
ANTHONY HARRISON,) CHAPTER: 13
)
Debtor)

RESPONSE TO DEBTOR'S MOTION TO SUSPEND PAYMENTS

COMES NOW, 1st CHOICE CREDIT UNION (“FCCU”) and files this Response to Debtors’ Motion to Suspend Payments (the “Motion”) (Docket # 48), and states:

1. The Debtor filed a petition for chapter 13 relief on February 2, 2019.
2. FCCU filed one secured claim in the amount of \$21,042.31 secured by a 2011 Dodge Challenger.
3. The Motion proposes to suspend plan payments for the months of May, June, and July 2020.
3. FCCU objects to the Motion unless it is provided adequate protection payments during the suspension of the plan payments. The Debtor is still enjoying the use and possession of the Dodge and the Dodge is continuing to depreciate due to its continued use.

WHEREFORE, FCCU prays that the Court order the Debtor to provide adequate protection payments during any period of suspension in plan payments.

Respectfully submitted this 25th day of June, 2020.

/s/ David C. Whitridge
DAVID C. WHITRIDGE
Georgia State Bar No. 754793

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CERTIFICATE OF SERVICE

This is to certify that I have this day served the foregoing *RESPONSE TO DEBTOR'S MOTION TO SUSPEND PAYMENTS* using the Bankruptcy Court's Electronic Case Filing program, which sends a notice of this document and an accompanying link to this document to the following parties who have appeared in this case under the Bankruptcy Court's Electronic Case Filing program: *Howard P. Slomka and Chapter 13 Trustee, Mellissa J. Davey*.

I further certify that on this day I caused a copy of this document to be served via U.S. First Class Mail, with adequate postage prepaid on the Debtor at the following address:

Anthony Harrison
617 Falcons Ridge
McDonough, Georgia 30253

This 25th day of June, 2020.

/s/ David C. Whitridge
DAVID C. WHITRIDGE
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